

**From:** Cynthia Caporale/ESC/R3/USEPA/US  
**Sent:** 3/6/2012 4:14:52 PM

**To:** **Ex. 4 - CBI**  
**CC:** **Ex. 4 - CBI**; Gary Newhart/CI/USEPA/US@EPA; John Gilbert/CI/USEPA/US@EPA; Kelley Chase/R3/USEPA/US@EPA; **Ex. 4 - CBI**; Sella Burchette/ERT/R2/USEPA/US@EPA; Fred Foreman/ESC/R3/USEPA/US@EPA; Robin Costas/ESC/R3/USEPA/US@EPA; Jennifer Gundersen/ESC/R3/USEPA/US@EPA  
**Subject:** Re: Verification/Completeness Check for Test America Data W15570 Posted Feb 27

Kelley and **Ex. 4 - CBI**

The report on the Dimock Verification/Completeness Check for Test America Data R33917 480-15770-1.PDF was reviewed and below are the responses for your consideration.

Test America-Validated Report-R33917 480-15770-1.PDF

1. The holding times were checked from the time of collection on the chain of custody (COC) to the time of analysis on the analysis log sheet. Based on the criteria in SW-846 8015 (references SW-846 Chapter 4-Organic Analysis), the holding time for an unpreserved sample for this analysis is 7 days. Samples HW02, FB02, FB03, FB04, HW01, HW02z, HW04, HW05, HW06, HW08A, HW12 and HW14 exceeded the holding time criteria and all sample results would be qualified estimated (UJ) or (J).

**Response: Validation used the 14 day holding time as the criteria, based on Table 2 of the Residential Well Sampling QA/QC Work Plan, to evaluate these samples.**

2. Raw data was not provided, it is assumed that all sample detections were within the established retention time criteria and the stated concentrations in the LCS and MS/MSD tables are correct and pass their QC criteria.

**Response: Raw data were provided by laboratory and reviewed during validation. LCS, MS/MSD concentration and recovery tables were evaluated during validation and any outliers noted in the EPA validation report. All raw data are retained by Region III EPA at Fort Meade.**

3. A 4 point initial calibration was used by the laboratory instead of the recommended minimum of 5 points.

**Response: Initial calibration were provided and evaluated during validation. Five point calibration was a recommendation; therefore, results were not qualified.**

4. It appears that the sample results were not qualified by their associated field blanks. The following field blanks contained 1 or more glycols: FB02 (1/24/12) contained diethylene glycol below the reporting limit (RL), the diethylene glycol results for HW04 would be qualified non-detect (U). FB03(1/25/12) contained diethylene glycol below the reporting limit (RL), the diethylene glycol results for HW02, HW01 and HW02z would be qualified (U). FB04(1/26/12) contained diethylene glycol below the reporting limit (RL), the diethylene glycol results for HW05, HW14 and HW14-P would be qualified (U). FB05(1/27/12) contained diethylene glycol below the reporting limit (RL), the diethylene glycol results for HW17, HW24 and HW24-P would be qualified (U). FB06 (1/30/12) contained diethylene glycol below the reporting limit (RL), the diethylene glycol results for HW13 would be qualified (U).

**Response: Elevating the QL and qualifying "U" is not the typical procedure for R3 validation; however, if appropriate for this project we support that decision. Since results were qualified "R" the the conclusion is the compounds were not present and, therefore, blank contamination is not applicable.**

5. Only 1 equipment blank (1/28/12) was shipped with this sampling batch. An equipment blank is required 1 blank/day/matrix or 1 blank/20 samples/matrix whichever is more frequent. The equipment blank contained diethylene glycol below the RL. No qualifications could be made based on this equipment blank because it could not be determined which samples it was associated with.

**Response: Diethylene glycol was determined to not be present in these samples; all results were not confirmed, and, therefore, are rejected (qualified "R"). Rejected results should not be used to determine blank contamination.**

6. Note: On qualifications of detections based on a second column analysis. Section 7.6.4 of SW846 8015B states, tentative identification of a single component analyte occurs when a peak from a sample extract falls within the daily retention time window.

Confirmation is required on a second column or by GC/MS. Since the flame ionization detector is non-specific, it is highly recommended that GC/MS confirmation be performed on single component analytes unless historical data are available to support the identification(s). This reviewer agrees with the qualification of unusable "R" by the Region 3 validation team.

**Response: No additional comment requested.**

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Cc: John Gilbert/CI/USEPA/US@EPA, Gary Newhart/CI/USEPA/US@EPA, Sella Burchette/ERT/R2/USEPA/US@EPA, **Ex. 4 - CBI**  
**Ex. 4 - CBI**  
Date: 03/05/2012 04:12 PM  
Subject: Verification/Completeness Check for Test America Data W15570 Posted Feb 27

.....is attached.

**Ex. 4 - CBI**

*Lockheed Martin*  
*Scientific, Engineering, Response and Analytical Services (SERAS)*

**Ex. 4 - CBI**

[attachment "SERAS-172-DSR-030512\_13.docx" deleted by Cynthia Caporale/ESC/R3/USEPA/US]